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TRAFFICSCHOOL.COM, INC. and DRIVERS ED DIRECT, LLC,
7 California companies.

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10
11 TRAFFICSCHOOL.COM, INC.,
a California corporation; DRIVERS ED
12 DIRECT, LLC, a California limited
liability company,

13 Plaintiffs,

14 vs.
15 REDRIVER, INC., ONLINE GURU,
16 INC. FIND MY SPECIALIST, INC.,
and SERIOUSNET, INC., California
17 corporations; RAVI K. LAHOTI, RAJ
LAHOTI, individuals,

18 Defendants.
19

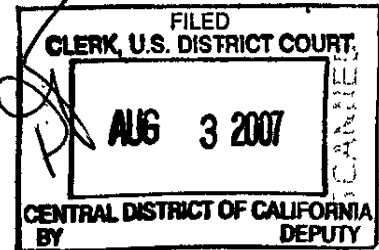
Case No. CV 06-7561 PA (Cwx)
The Honorable Percy Anderson.
The Honorable Carla Woehrle.

**NOTICE OF MOTION BY
PLAINTIFFS' TO COMPEL THE
PRODUCTION OF DOCUMENTS
AND REQUEST FOR SHORTENED
HEARING OF SAME; [PROPOSED]
ORDER RE: SAME**

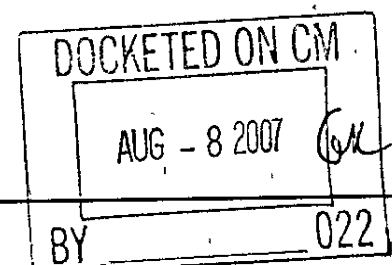
[Filed Concurrently with Joint Stipulation of the Parties
Regarding Plaintiffs' Motion to Compel the Production of
Documents and For Shortened Hearing Of Same,
Declaration of Mina I. Hamilton in Support of Motion and
Declarations of Brian M. Daucher and Steve Moretti in
Opposition]

Hearing Date: 8/28/2007
Requested Hearing Date: 8/14/2007
Time: 10:00 a.m.
Place: Hon. Carla Woehrle
Los Angeles, Roybal, Crt. No. 640

Trial Date: 10/30/2007
Pretrial Date: 10/5/2007
Discovery Cut-Off: 8/20/07



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1 TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Plaintiffs TRAFFICSCHOOL.COM, INC. and
3 DRIVERS ED DIRECT, LLC ("Plaintiffs"), on August 14, 2007 at 10:00 a.m. in
4 Courtroom 640 of the United States Courthouse, 255 East Temple Street, Los
5 Angeles, California (or as soon after as the Court may allow), will and hereby does
6 move the court for the production of documents as set forth in the joint stipulation of
7 the parties concurrently filed herewith.

8 The parties have jointly requested a shortened time for hearing the motion to
9 be August 14, 2007, before the close of discovery on August 20, 2007. See, Joint
10 Stipulation. Good cause exists for this request as it is not based on the lack of
11 diligence of the parties. On April 24, 2007, Plaintiffs served their request for
12 documents on Defendants Online Guru, Inc. and Edriver, Inc. (Defendants' Answer
13 to the FAC was filed on April 4, 2007). In May 2007, counsel for both parties
14 participated in lengthy discussions in an effort to resolve their differences and
15 achieved some resolution, but agreed to further confer on others. On June 1, 2007,
16 Defendants served their responses to Plaintiffs discovery requests. Defendants'
17 produced some documents on Friday, June 22 and thereafter before the first
18 deposition in the case on June 29, 2007.

19 Plaintiffs believe the production is inadequate and improper in the respects
20 that are addressed in the joint stipulation and the parties in July diligently sought to
21 confer to obviate the need for a motion to compel or at least to narrow the issues in
22 dispute, to no avail. The Plaintiffs submitted their portion of the joint stipulation to
23 Defendants and granted Defendants an extension of time to provide their portion due
24 to a family emergency of Defendants' counsel, as stated in the Joint Stipulation.

25 This motion follows the meeting of counsel pursuant to Local Rule 7-3. The
26 meeting of counsel took place first in May, 2007 and continued from time to time
27 thereafter.

1 This Motion is filed concurrently with the following documents:

- 2 1. Joint Application of the Parties to File Documents Under Seal; [Proposed]
3 Order Thereon;
4 2. Joint Stipulation of the Parties Regarding Plaintiffs' Motion to Compel the
5 Production of Documents and For Shortened Hearing of Same;
6 3. Declaration of Mina I. Hamilton In Support of Motion and Exhibits;
7 4. Declarations of Brian M. Daucher and Steve Moretti in Opposition and
8 Exhibits.

9 The motion is also based on the Court's files, and such further evidence and
10 argument as the Court may require.

11 DATED: August 3, 2007

LEWIS BRISBOIS BISGAARD & SMITH LLP

12
13 By Mina I. Hamilton

14 Mina I. Hamilton
15 Attorneys for Plaintiffs
16 TRAFFICSCHOOL.COM, INC. and
DRIVERS ED DIRECT, LLC,
California companies.

17 Having considered the Application by the parties, and finding good cause
18 therefor, the application for a shortened hearing time is granted.

19 **IT IS SO ORDERED.**

20
21 DATED: August 8, 2007

22 Charles M. White
UNITED STATES DISTRICT COURT
JUDGE

1 **PROOF OF SERVICE**

2 TrafficSchool.com, Inc. v. Edriver, Inc. - File No. 25162.14

3 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

4 I am employed in the County of Los Angeles, State of California. I am over
5 the age of 18 and not a party to the within action. My business address is 221 N.
6 Figueroa Street, Suite 1200, Los Angeles, California, 90012.

7 On August 3, 2007, I served the following document described as
8 **NOTICE OF MOTION BY PLAINTIFFS' TO COMPEL THE PRODUCTION**
9 **OF DOCUMENTS AND REQUEST FOR SHORTENED HEARING OF**
10 **SAME; [PROPOSED] ORDER RE: SAME** all interested parties in this action by
11 placing ☒ a true copy ☐ the original thereof enclosed in sealed envelopes
12 addressed as follows:

13 Brian M. Daucher, Esq.
14 Joseph H. Tadros, Esq.
15 SHEPPARD MULLIN RICHTER & HAMPTON
16 650 Town Center Drive, 4th Floor
17 Costa Mesa, California 92626-1925
18 Telephone: (714) 513-5100
19 bdaucher@sheppardmullin.com
20 jtadros@sheppardmullin.com

21 ☒ (BY MAIL, 1013a, 2015.5 C.C.P.)

22 ☐ I deposited such envelope in the mail at Los Angeles, California. The
23 envelope was mailed with postage thereon fully prepaid.

24 ☒ I am readily familiar with the firm's practice for collection and
25 processing correspondence for mailing. Under that practice, this document will be
26 deposited with the U.S. Postal Service on this date with postage thereon fully prepaid
27 at Los Angeles, California in the ordinary course of business. I am aware that on
28 motion of the party served, service is presumed invalid if postal cancellation date or
postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ (FEDERAL) I declare that I am employed in the office of a member of the bar
of this Court at whose direction the service was made.

Executed on August 3, 2007 at Los Angeles, California.



CORA RUVALCABA